

1 Ryan T. Gormley, Esq.  
2 Nevada Bar No. 13494  
rgormley@wwhgd.com  
3 WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC  
4 6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118  
Telephone: (702) 938-3838  
5 Facsimile: (702) 938-3864

6 Steven D. Turner, Esq.  
7 *Admitted Pro Hac Vice*  
8 *sturner@jonesturner.com*  
9 Marietta Meyers-Lopez, Esq.  
10 *Admitted Pro Hac Vice*  
11 *mmeyers@jones@jonesturner.com*  
12 JONES TURNER, LLP  
13 2 Venture, Suite 220  
14 Irvine, California 92618  
15 Telephone: (949) 435-4100

*Attorneys for Defendant Factory Mutual  
Insurance Company*

**UNITED STATES DISTRICT COURT**

# DISTRICT OF NEVADA

16 GOLDEN ENTERTAINMENT, INC.

Case No.: 2:21-cv-00969-APG-EJY

Plaintiff,

18 || vs.

**STIPULATION TO CONTINUE (1) THE  
FILING DATES FOR FACTORY MUTUAL  
INSURANCE COMPANY'S MOTION TO  
DISMISS AND CORRESPONDING  
RESPONSES, AND (2) THE DEADLINE  
FOR FACTORY MUTUAL INSURANCE  
COMPANY TO PRODUCE CERTAIN  
DOCUMENTS ORDERED BY THE COURT**

19 FACTORY MUTUAL INSURANCE  
COMPANY,

Defendant.

24 Inasmuch as defendant Factory Mutual Insurance Company (“FMIC”) has advised plaintiff  
25 Golden Entertainment, Inc. (“Golden”) that it needs additional time to complete its production of  
26 certain documents and associated privilege log(s) as ordered by the Court at the February 6, 2024  
27 hearing on FMIC’s Motion for Protective Order (see ECF No. 106 (Transcript of Proceedings  
28 dated February 6, 2024 (held to be the Order of the Court) at 40-56), and the parties wish to work

1 cooperatively to schedule the production deadline so that it falls 21 days prior to the deadline for  
2 FMIC to file a responsive pleading to Golden's Second Amended and Supplemental Complaint  
3 ("SAC"), inasmuch as FMIC intends to file a motion to dismiss the SAC, and inasmuch as the  
4 Court previously granted one extension at the parties' joint request (ECF No. 108), the parties, by  
5 and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, the current deadline for FMIC to complete its document production is April  
7 23, 2024 (ECF No. 108 at 3);

8 WHEREAS, the current deadline for FMIC to file its renewed motion to dismiss is May 7,  
9 2024 (*Id.*);

10 WHEREAS, the current deadline for Golden to file its response to FMIC's renewed motion  
11 to dismiss is May 29, 2024 (*Id.*);

12 WHEREAS, the current deadline for FMIC to file its reply to Golden's response is June  
13 12, 2024 (*Id.*);

14 WHEREAS, counsel for FMIC represents that it has been diligent in identifying, reviewing  
15 and producing the documents ordered by the Court for production at the February 6, 2024 hearing,  
16 but needs additional time to complete that production, including any associated privilege logs;

17 WHEREAS, the firm of Jones Turner, LLP, counsel for FMIC, consists of three attorneys,  
18 only two of which are assigned to work on this case given the firm's workload and other pending  
19 matters;

20 WHEREAS, at the February 6, 2024 hearing, the Court invited the parties to seek the  
21 Court's assistance with any problems that might arise regarding the production (ECF No. 106 at  
22 56);

23 WHEREAS, Golden and FMIC agree that it would be in the interests of the parties and this  
24 Court to continue FMIC's production deadline by 30 days, up to and including May 23, 2024 and  
25 to continue FMIC's filing date for its renewed motion to dismiss to June 13, 2024 (thus allowing  
26 Golden time to review FMIC's completed production prior to filing of the renewed motion to  
27 dismiss);

28

1           WHEREAS, Golden and FMIC agree that Golden may have four weeks to respond to  
2 FMIC's renewed motion to dismiss; and

3           WHEREAS, this is the second stipulation for an extension of time to complete the  
4 production of documents pursuant to the Court's February 6, 2024 ruling and the third stipulation  
5 for an extension of time for FMIC to file its renewed motion to dismiss;

6           NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that:

- 7           1. FMIC's production of documents, and any associated privilege logs, pursuant to the  
8           Court's March 18, 2024 Order (Doc. 108) shall be completed on or before **May 23,**  
9           **2024**;
- 10           2. FMIC's new filing deadline for its renewed motion to dismiss is **June 13, 2024**;
- 11           3. Golden's response to such motion is due **July 11, 2024**; and
- 12           4. FMIC's reply is due on **July 25, 2024**.

13 <<< continued on next page >>>

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Dated: April 19, 2024

2 LATHAM & WATKINS LLP

3 By: /s/ Corey D. McGehee  
4 BROOK B. ROBERTS, ESQ.\*  
5 JOHN M. WILSON, ESQ.\*  
6 COREY D. MCGEHEE, ESQ.\*  
7 12670 High Bluff Drive  
8 San Diego, California 92130

9 CHRISTINE G. ROLPH, ESQ.\*  
10 555 Eleventh Street, NW, Suite 1000  
11 Washington, D.C. 20004-1304

12 \*admitted pro hac vice

13 *Attorneys for Plaintiff*  
14 *Golden Entertainment, Inc.*

15 Dated: April 19, 2024

16 WEINBERG, WHEELER, HUDGINS,  
17 GUNN & DIAL, LLC

18 By: /s/ Ryan T. Gormley  
19 RYAN T. GORMLEY, ESQ.  
20 Nevada Bar No. 13494  
21 6385 South Rainbow Blvd., Suite 400  
22 Las Vegas, Nevada 89118

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

FRANK M. FLANSBURG III, ESQ.  
Nevada Bar No. 6974  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614

JONES TURNER LLP

STEVEN D. TURNER, ESQ.\*  
MARIETTA A. MEYERS-LOPEZ\*  
2 Venture, Suite 220  
Irvine, California 92618

\*admitted pro hac vice

*Attorneys for Defendant*  
*Factory Mutual Insurance Company*

19 **IT IS SO ORDERED:**

20   
21 Clayton J. Zouchah  
22 UNITED STATES MAGISTRATE JUDGE

23 Dated: April 22, 2024

24

25

26

27

28